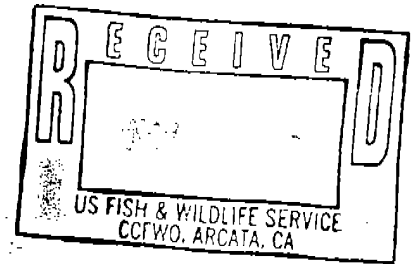


003628

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November 16, 1998

Directed to Bruce Halstead
U.S. Fish and Wildlife Service
Stewart School Building
1125 16th Street
Arcata, CA 95521

Written Comments on the DEIS/EIR submitted regarding permit number PRT-829509 and number 1157. Submitted by Dan Ihara.

These comments and attached exhibits are submitted to the U.S. Government and the State of California in care of their representatives. These comments regard the above referenced permit as stated on page 1-21 of the Draft Environmental Impact Statement/Environmental Impact Report for the Headwaters Acquisition and the PALCO Sustained Yield Plan and Habitat Conservation Plan. These comments are in addition to the oral and written comments presented to you at the hearing at Redwood Acres Eureka, CA on Tuesday November 10th.

Issues:

1. Gross errors in "Average harvest per decade" figures given on Tables 3.9-6a, 3.9-6c, 3.9-6e, 3.9-6g and 3.9-6i on pages 3.9-37, 3.9-38, 3.9-40 and 3.9-41 respectively of the Draft EIS (volume 1):

The "Average harvest per decade" in the above referenced tables are overstated in the magnitude of hundreds of million of board feet per decade. For example for the Proposed Project alternative 2 (Table 3.9-6c p. 3.9-38) the DEIS has the average harvest value per decade as 2,308,247,000 i.e. 2 billion 308 million board feet per decade. The correct value is 1,923,539,000 board feet per decade -- an error of nearly 400 million board feet.

That an error of this magnitude exists can be easily confirmed by examining the "Average Harvest per decade" Table 3.9 6b below it on the same page (see attachment A2). This table has the "Average Harvest per decade for "All Ownerships" in this alternative. For alternative 2, "All Ownerships" involves exactly and only the identical lands. Consequently Table 3.9 -6d has the identical figures for each of the 12 decades as Table 3.9-6c above it. This page, then, has two identical lists of twelve numbers and has two different averages for these identical lists. The average on the bottom of the page is correct and the top average is overstated by nearly 400 million board feet.

For alternative 1, the average harvest per decade for "PALCO Lands Only" are in excess of the average harvest for "All Ownerships" involved in the alternative. This is a logical impossibility.

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Similar examination of the average harvest per decade for Alternatives 1, 2a, 3 and 4 reveal for "PALCO Lands Only," but not for "All Ownerships", similar overstatements involving hundreds of millions of board feet.

2. Implication 1 of the Gross Errors Described in Issue #1 above --

False Portrayal of the Alternatives in the DEIS:

The "Average harvest by decade" is one of the key and central summary statistics with which to compare the alternatives examined in the DEIS. This key statistic is falsely and prominently misstated by millions of board feet on five consecutive pages involving each of the alternatives under examination.

3. Implication 2 of the Gross Errors Described in Issue #1 above -

Invalidating Comparability of Alternatives:

These false averages reported in the DEIS are unusable for comparing the alternatives. These false averages more than mislead the public as to the magnitudes of the average harvests per decade in the alternatives. In addition the false average reported in the DEIS makes meaningful comparison between the effect on "PALCO Lands Only" and "All Ownerships" impossible.

4. Implication 3 of the Gross Errors Described in Issue #1 above -

Extremely Careless Review of the Document.

That such an error could escape the attention of "PALCO", its source, Vestron Resources, and all agencies and others who have examined the document, is astounding. These averages can be seen to be erroneous on the most superficial examination of the document. They are logically impossible. Apparently no one prior to the publication of the DEIS thought about what was being reported for this key statistic.

Furthermore, I know of no errata sheet that was published or announced to the public that would have alerted the public to these errors contained in the DEIS.

The question arises, if such an obvious error, exists on five successive pages of the DEIS, how many less obvious errors exist below the surface in the sophisticated computer modeling and analysis.

5. Implication 4 of the Gross Errors Described in Issue #1 above -

Correction of these erroneous averages in a Final EIS is not sufficient for correcting the damage done to the review and hearing process:

Merely noting and correcting these errors in a Final EIS does not address the misrepresentation that has occurred during the review and hearing process. It is not defensible for a DEIS to contain false information on basic and key statistics and then only correct this false information after the hearing process has closed. Allowing such a practice would open the doors for draft EIS's to become filled with false and

misleading information which are changed only after the public's opportunity to comment has ended. Such a practice would seriously, perhaps, fatally undermine the validity of the hearing and public comment process and should not be allowed.

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6. Implication 5 of the Gross Errors Described in Issue #1 above -

Reopening or extending the public hearing and public comment period would not be an adequate way to redress the publication of a draft EIS with basically false information:

Reopening or extending the public hearing and public comment period would not be an adequate way to redress the publication of a draft EIS with basically false information, because the attention, concern and focus which occurs with the public hearing and public comment period can not be duplicated by a surprise, unexpected reopening or extending of the public hearing and public comment period. Significant numbers of people who are concerned in the issue are likely not to be aware that information previously made available to them was erroneous and consequently would not have the same opportunity to comment as if they had the correct information initially. Reopening or extending the public hearing and public comment period would be allowing erroneous information to be publicly disseminated and corrected after the public has been informed public comment has been closed. Reopening or extending public comment would create an incentive to inadvertently or intentionally withhold information until after the close of what the public thought was the end of the final public comment period.

7. Implication 6 of the Gross Errors Described in Issue #1 above -

The only appropriate response to erroneous reporting of key statistics and information is disapproval of the proposed plan and withdrawal of the draft EIS

When key statistics are obvious and blatantly incorrectly reported in a Draft EIS, the only appropriate response is the disapproval of the plan and withdrawal of the draft EIS. Only a completely new plan with correct information and only a Draft EIS containing correct key information would create a situation even approaching an opportunity for the public to comment on the basis of correct information.

No further resubmission of a new plan and a new draft EIS should be allowed. An applicant has one opportunity to receive the review of the public and the attention and expense of public agencies. Clearly an applicant could not repeatedly expect to receive the attention and expense of public agencies and of the public, if it repeatedly submitted erroneous information.

In any case the cost of further review by public agencies should be borne by the applicant, if a new plan is submitted and new public agency review and review by the public is necessitated.

8. Additional comment on the errors in "Average Harvest per decade" --

Erroneous or possibly capricious alteration of statistics and the need for full disclosure and discovery related to possible other instances of similar or related sources of erroneous information published in the DEIS

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The erroneously reported averages are the sum of the twelve decades of timber harvests with the decimal point, for no good reason, moved to the right one place. Possibly the 12 numbers were added and ~~since then~~ since they appeared too big by an order of 10, i.e. because they had one more place than the numbers above them, the number was simply reduced by a magnitude of 10. This of course is not how an average of 12 decades is computed. The number should have been divided by 12. Consequently the numbers are overstated by 20% which, as noted above, involves hundreds of millions of board feet.

The point is that through, either some error or some capricious alteration or other reason, this average is falsely reported. Again, that such an error or capricious alteration of such a key and obvious statistic could occur raises serious questions regarding the correctness of other statistics published in the HCP/SYP and DEIS. The extent of similar or related sources of erroneous information published in the DEIS warrants full investigation, disclosure and discovery before any Final EIS on this project could be approved or if it is approved warrants review in the courts regarding erroneous or misleading information published in the DEIS

Some other issues related to the DEIS:

9. Possible Inadequacies in Addressing Issues raised in the scoping session:

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During the scoping session I submitted in writing a comment requesting a number of things including investigation of the impact on the Northwestern Pacific Railroad by harvesting of timber on land adjacent or near to the NWP's railroad track for which PALCO has harvest rights. I can find no mention of this serious and significant request that I made in writing ~~to~~ during the scoping sessions.

First, I wonder: why this significant issue was not specifically addressed in the DEIS.

Second, I wonder if other significant issues raised during the scoping session were similarly not specifically, directly and adequately addressed in the DEIS. And if so, why not.

Third, if there ^{are} significant issues I and others raised during scoping sessions ^{which} were not specifically, directly and adequately addressed in the DEIS, the validity of the DEIS process is thrown into question. Again, merely appending any responses to overlooked significant issues after the public comment period has ended would not be an adequate response because the public would not have an opportunity to review and comment on such comments added after the close of the public comment period.

Fourth, the process of determining what comments obtained during the scoping sessions warranted comment in the DEIS should be opened to investigation, disclosure, and discovery before any Final EIS on this project could be approved or if it is approved warrants review in the courts regarding possible inadequacies in the handling of issues raised during the scoping sessions.

10. Adequacy of the availability of the draft EIS:

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Although it is commendable that the Draft EIS was available over the internet, the printed copy of the Draft EIS was not available at Humboldt State University Library reserve desk (as was the 6 volume HCP/SYP), as I believe, it was stated in the DEIS. Neither the circulation desk clerks nor the reference librarian, Gloria

Fulton, were able to locate any record of the document being at the library. Since Humboldt State University is one of the key and in some ways the most critical place for the review of a technical document involving a major project located in Humboldt County, the lack of availability of a print document containing the details of the DEIS is a significant short coming.

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The unavailability of the DEIS at Humboldt State University Library raises questions regarding the availability of the DEIS at other University Libraries and elsewhere. Unavailability of a print, "hard copy" of the DEIS is a serious issue for the public review and comment process and warrants investigation, disclosure, and discovery before any Final EIS on this project could be approved or if it is approved warrants review in the courts regarding possible inadequacies regarding the availability of print "hard copies" of the DEIS especially at institutions of higher education.

11. Constraint of calculation of LTSY as a percentage of the harvest average over the past 10 years:

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The linear optimization problem solved to compute the LTSY used constraints based on PALCO average over the last 10 years. As an economist, it is my opinion, that there is no sound economical reason to constrain the calculation of long term sustainable yield as a function of the average harvest of the last 10 years, especially without discussing the economic and environmental justification for doing so. As noted in my other written and oral comments, these were years of harvesting in excess of growth and were double the rate prior to 1985. They appear to be necessitated by financial considerations related to the bond indebtedness of Maxxam. There appears to be no discussion establishing the legal or economic validity of basing a timber harvest constraint on what could be characterized as a speculative investment.

12. Questions regarding the average of PALCO timber harvests and employment over the last 10 years:

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Apparently the averages used in the DEIS for PALCO'S average timber harvests and employment are based on a communication by PALCO. There appears to be no independent verification or investigation of these averages in the DEIS. Rather than an average, it appears that PALCO employment had a peak of 1680 jobs during this period, rather than an average. Consequently using this peak as an average is deceptive. Not conducting independent investigation and verification of these averages is a deficiency of the DEIS. Since the economic analysis of the DEIS uses these averages as a basis to compare impacts of the alternatives, the lack of independent verification or investigation of these averages undermines the validity of conclusions drawn in the DEIS concerning the alternatives.

13. The Economic Analysis in the DEIS is fundamentally flawed

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Because the DEIS uses a ten year period marked by over harvesting as a "base year" or basis for comparison as described in my other written comments the DEIS's economic impact is fundamentally flawed. See my other written comments

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submitted at the public hearing of November 10th and also attached to this submission.

14. Issues related to Siskiyou Forestry Consultants Report Must Be Addressed:

Siskiyou Forestry Consultants prepared a report on the HCP/SYP DEIS which was submitted as public comment to the DEIS. This report contains information that calls into question the calculations of timber growth, roads and other statistics. These questions must be adequately addressed before any Final EIS is approved and if they are not adequately addressed the DEIS must be not approved. If, though, it is approved and these, and other issues are not adequately addressed it is proper that a determination in the courts with full disclosure, investigation and discovery is warranted.

15. Additional Economic Analysis:

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There are sufficient fundamental questions regarding the economic impact analysis and environmental and other analysis contained in the DEIS that investigation of the process by which the DEIS analysis was conducted needs to be investigated.

In particular a second opinion is warranted for the economic impact analysis, I suggest Professor Ed Whitelaw of Eco Northwest and the University of Oregon. Dr. Whitelaw was a key economist in the President's Northwest Forest, or Option 9 process and review by him and his associates of the DEIS economic impact analysis is warranted.

Sincerely and respectfully submitted,



Daniel M., Ihara, Ph.d.

attachments:

1A - 1E

2A, B and C

3 SISKIYOU FORESTRY CONSULTANTS

cc: Environmental Protection Information Center

Northcoast Environmental Center

Sierra Club, North Coast Chapter, c/o Josh Kaufman

Table 3.9-6a. Alternative 1 Projected Harvest, Growth and Inventory Volumes, PALCO Lands Only

Period	Inventory mbfn	Growth mbfn/Decade	Harvest mbfn/Decade ¹⁷
1	5,449,668	1,776,411	1,712,518
2	5,519,974	1,969,291	1,455,640
3	6,040,969	2,060,757	1,273,685
4	6,823,296	2,115,451	1,146,316
5	7,782,037	2,154,438	1,031,685
6	8,907,006	2,245,756	1,127,145
7	10,031,920	2,203,339	1,239,859
8	10,997,100	2,160,019	1,363,845
9	11,778,450	2,156,422	1,227,461
10	12,710,390	2,093,086	1,298,013
11	13,505,120	2,044,685	1,427,814
12	14,119,050	1,983,455	1,285,032
Average harvest per decade			1,558,901

¹⁷ Indicated harvest volumes are maximum values. Detailed mapping of Class III stream distribution is poorly known. Class III streams would remove a substantial area from timber harvest, reducing timber volume proportionately.

Source: Vestra Resources

Table 3.9-6b. Alternative 1 Projected Harvest, Growth and Inventory Volumes, All Ownerships

Period	Inventory mbfn	Growth mbfn/Decade	Harvest mbfn/Decade ¹⁷
1	5,765,852	1,886,848	1,826,672
2	5,831,391	2,080,613	1,552,671
3	6,366,656	2,181,789	1,358,587
4	7,186,314	2,238,901	1,222,728
5	8,193,011	2,277,859	1,100,455
6	9,371,659	2,370,337	1,199,599
7	10,549,331	2,325,168	1,319,557
8	11,555,501	2,282,520	1,451,514
9	12,372,068	2,275,674	1,306,364
10	13,343,499	2,210,512	1,369,025
11	14,184,208	2,161,072	1,500,447
12	14,842,980	2,103,966	1,350,402
Average harvest per decade			1,379,835

¹⁷ Indicated harvest volumes are maximum values. Detailed mapping of Class III stream distribution is poorly known. Class III streams would remove a substantial area from timber harvest, reducing timber volume proportionately.

Source: Vestra Resources

Table 3.9-6c. Alternative 2 Projected Harvest, Growth and Inventory Volumes, PALCO Lands Only

Period	Inventory mbfn	Growth mbfn/Decade	Harvest mbfn/Decade
1	5,004,554	1,774,647	2,335,188
2	4,453,995	1,882,000	1,984,910
3	4,355,315	2,012,830	1,736,796
4	4,632,062	2,168,834	1,563,117
5	5,224,017	2,279,668	1,406,805
6	6,105,130	2,432,650	1,547,485
7	6,991,135	2,438,911	1,702,235
8	7,713,918	2,401,156	1,872,458
9	8,259,261	2,403,115	2,059,703
10	8,596,446	2,336,072	2,265,674
11	8,661,314	2,333,723	2,335,188
12	8,670,639	2,303,732	2,272,910
Average harvest per decade			2,308,247
Source: Vestra Resources			

Table 3.9-6d. Alternative 2 Projected Harvest, Growth and Inventory Volumes, All Ownerships

Period	Inventory mbfn	Growth mbfn/Decade	Harvest mbfn/Decade
1	5,765,776	1,836,051	2,335,188
2	5,276,123	1,958,112	1,984,910
3	5,254,076	2,093,173	1,736,796
4	5,611,453	2,252,225	1,563,117
5	6,286,254	2,365,061	1,406,805
6	7,252,298	2,518,185	1,547,485
7	8,224,242	2,523,319	1,702,235
8	9,030,489	2,482,999	1,872,458
9	9,658,826	2,481,814	2,059,703
10	10,073,819	2,410,998	2,265,674
11	10,212,807	2,404,742	2,335,188
12	10,293,787	2,371,094	2,272,910
Average harvest per decade			1,923,539
Source: Vestra Resources			

Table 3.9-6e. Alternative 2a Projected Harvest, Growth and Inventory Volumes, PALCO Lands Only

Period	Inventory mbfn	Growth mbfn/Decade	Harvest mbfn/Decade
1	4,753,875	1,687,490	2,214,804
2	4,237,429	1,798,277	1,882,584
3	4,156,761	1,926,177	1,647,261
4	4,433,885	2,070,135	1,482,534
5	5,013,994	2,149,884	1,334,281
6	5,829,290	2,299,189	1,467,709
7	6,668,259	2,308,340	1,614,480
8	7,347,991	2,286,386	1,775,928
9	7,867,960	2,293,287	1,953,521
10	8,207,870	2,224,160	2,148,873
11	8,274,432	2,200,235	2,214,804
12	8,271,474	2,170,072	2,214,804
Average harvest per decade			2,195,158
Source: Vestra Resources			

Table 3.9-6f. Alternative 2a Projected Harvest, Growth and Inventory Volumes, All Ownerships

Period	Inventory mbfn	Growth mbfn/Decade	Harvest mbfn/Decade
1	5,765,856	1,836,949	2,328,958
2	5,283,437	1,959,057	1,979,615
3	5,266,990	2,099,015	1,732,163
4	5,633,609	2,247,063	1,558,946
5	6,314,119	2,327,885	1,403,051
6	7,237,673	2,477,899	1,540,163
7	8,183,489	2,483,044	1,694,178
8	8,956,442	2,459,429	1,863,597
9	9,563,185	2,460,583	2,032,424
10	9,990,178	2,386,691	2,219,885
11	10,147,178	2,358,742	2,287,437
12	10,231,438	2,329,980	2,280,174
Average harvest per decade			1,910,049
Source: Vestra Resources			

Table 3.9-6g. Alternative 3 Projected Harvest, Growth and Inventory Volumes, PALCO Lands Only

Period	Inventory mbfn	Growth mbfn/Decade	Harvest mbfn/Decade
1	5,005,011	1,945,292	868,780
2	6,080,636	2,336,434	738,463
3	7,677,539	2,429,402	682,237
4	9,427,687	2,438,099	750,460
5	11,102,300	2,412,273	825,506
6	12,693,210	2,367,675	908,057
7	14,159,390	2,275,082	998,863
8	15,435,010	2,199,165	1,028,151
9	16,603,940	2,164,642	1,009,240
10	17,756,270	2,147,402	1,031,919
11	18,854,930	2,114,680	1,135,111
12	19,846,100	2,068,821	1,219,592
Average harvest per decade			1,119,638
Source: Vestra Resources			

Table 3.9-6h. Alternative 3 Projected Harvest, Growth and Inventory Volumes, All Ownerships

Period	Inventory mbfn	Growth mbfn/Decade	Harvest mbfn/Decade
1	5,766,233	2,006,696	868,780
2	6,902,764	2,412,546	738,463
3	8,576,300	2,509,745	682,237
4	10,407,078	2,521,490	750,460
5	12,164,537	2,497,666	825,506
6	13,840,378	2,453,210	908,057
7	15,392,497	2,359,490	998,863
8	16,751,581	2,281,008	1,028,151
9	18,003,505	2,243,341	1,009,240
10	19,233,643	2,222,328	1,031,919
11	20,406,423	2,185,699	1,135,111
12	21,469,248	2,136,183	1,219,592
Average harvest per decade			1,119,638
Source: Vestra Resources			

Table 3.9-6i. Alternative 4 Projected Harvest, Growth and Inventory Volumes, PALCO Lands Only

Period	Inventory mbfn	Growth mbfn/Decade	Harvest mbfn/Decade
1	3,584,814	1,268,785	1,650,204
2	3,208,559	1,305,344	1,438,906
3	3,080,168	1,409,948	1,259,043
4	3,226,913	1,538,274	1,133,139
5	3,625,893	1,617,536	1,019,824
6	4,227,653	1,694,771	1,121,807
7	4,799,324	1,667,898	1,233,988
8	5,233,991	1,634,934	1,357,386
9	5,508,235	1,631,820	1,401,206
10	5,742,365	1,627,587	1,524,437
11	5,843,837	1,652,671	1,500,185
12	6,000,666	1,627,228	1,650,204
Average harvest per decade			1,629,033
Source: Vestra Resources			

Table 3.9-6j. Alternative 4 Projected Harvest, Growth and Inventory Volumes, All Ownerships

Period	Inventory mbfn	Growth mbfn/Decade	Harvest mbfn/Decade
1	4,392,298	1,374,525	1,708,956
2	4,041,185	1,424,967	1,488,846
3	3,955,634	1,540,688	1,302,740
4	4,161,797	1,676,413	1,172,466
5	4,628,606	1,761,035	1,055,218
6	5,307,173	1,843,576	1,160,741
7	5,957,812	1,812,994	1,276,815
8	6,462,627	1,776,713	1,404,496
9	6,801,369	1,769,940	1,453,027
10	7,090,097	1,761,252	1,581,440
11	7,238,534	1,782,123	1,558,937
12	7,437,184	1,753,996	1,708,956
Average harvest per decade			1,687,264
Source: Vestra Resources			

Table 3.9-7. Yarding Method on PALCO Lands for the First Decade For Each Alternative (approximate acres)

Method	Alternative				
	1	2	2a	3	4
Cable	11,258 (29%)	14,399 (26%)	14,329 (27%)	2,499 (20%)	12,198 (46%)
Tractor ^{1/}	28,176 (71%)	40,482 (74%)	38,669 (73%)	10,167 (80%)	26,716 (54%)

^{1/} The FREIGHTS model overestimates the amount of potential tractor logging because slope steepness constraints are not modeled well. It is estimated that about 35 to 40 percent of PALCO's ownership is suitable for tractor logging (D. Opalach, PALCO, Personal communication, September 9, 1998).

Source: Vestra Resources

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November 10, 1998

Written Comments on the DEIS/EIR submitted to staff at the registration table at the hearing held at Redwood Acres November 10, 1998 regarding permit number PRT-829509 and number 1157. Submitted by Dan Ihara.

Attached to this page of comments are two additional pages of comments all of which are submitted to the U.S. Government and the State of California in care of their representatives. These comments regard the above referenced permit as stated on page 1-21 of the Draft Environmental Impact Statement/Environmental Impact Report for the Headwaters Acquisition and the Palco Sustained Yield Plan and Habitat Conservation Plan.

As a professional economist with a Ph.D. in economics and as an individual citizen I find the economic impact section of the DEIS/EIR fundamentally flawed (see attached). The DEIS/EIR uses the average of the ten years (1986-1997) as the base year for the economic impact analysis. These ten years were years of unsustainable levels of harvesting. This can be seen by looking at Alternative 1, the "No Project" alternative which involves harvest levels under existing laws (see attached).

A sensitivity analysis under different assumptions for determination of a base year would be an improvement, but it would be insufficient to address the need to examine the economic impact of the "Proposed Project" alternative using the most realistic assumptions. The most realistic assumptions for determining a base year include those of the "No Project" Alternative. Unless assumptions involving sustainable harvest and employment levels under existing laws are used as the basis for determining the base year, the DEIS/EIR economic analysis would remain fundamentally flawed and consequently should not be approved.

This submission is not necessarily my only written comment on DEIS/EIR permit.

Respectfully and sincerely submitted,

Daniel M. Ihara, Ph.D.

Evaluation of Economic Impact Analysis
in the
Environmental Impact Statement
of
Pacific Lumber's Habitat Conservation Plan (HCP)

Summary:

The economic impact analysis contained in the HCP's EIS is fundamentally flawed. The EIS uses the average harvests level of the last 10 years as a basis for comparison. The years 1986 - 1997 saw unsustainable and using the average of these years as the base year is completely unrealistic. The EIS should have used the "No Project" alternative which gives harvest levels based on current laws. The HCP and the EIS did not evaluate what could be the most ecologically and economically viable alternative, the 63,000 acre management area described in the Trees Foundations Stewardship Plan. The HCP provides for 418 jobs over and above what could be sustained under existing law. With a "No Project" scenario, the total payroll for these jobs for five years could be mitigated for \$60 million. Since under a "No Project" scenario the state and federal governments would not be paying \$480 million to Maxxam, the state and federal governments could completely mitigate any payroll loss and still save \$420 million.

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Facts and Points:

1. Over the last 10 years (1988 - 1997) Pacific Lumber's harvests have averaged 250 million board feet a year and its employment level is 1,680 employees.
2. Prior to 1985, Pacific Lumber harvests were 120 million board feet a year and its employment was 900.
3. The HCP uses the average of the last 10 years as the base year for evaluating economic impact of the HCP.
4. The HCP proposes to harvest an average of 234 million board feet a year during the first decade of the plan. This implies an employment level of 1,565 with, according to the EIS, a "job loss" of 115, compared to the average employment level over the last 10 years.
5. Using the last ten years for comparison the EIS says that the "No Project" alternative has a "job loss" of 533 jobs; the Selective Cut alternative has a "job loss" of 1,098 jobs; and the "63,000 Acre No-cut Preserve" alternative has a "job loss of 574."
6. All the EIS's so called "job loss" figures in the report are meaningless, since they compare employment to harvest levels that can not be continued into the time frame being analyzed.

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(please see other side)

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(continued from other side)

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7. The "No Project" alternative described in the HCP and EIS has harvest levels based on existing laws. Under existing laws an average of 171 million board feet can be harvested each year over the next 10 years. This implies an employment level of 1,147 jobs.
8. Using the "No Project" Alternative as a basis for comparison, the HCP can be considered as having 418 more jobs than current law would allow. The question is, do the benefits of these additional jobs outweigh the environmental and other costs such as possible extinction of species?
9. These 418 jobs involve an annual payroll of approximately \$12 million. The payroll loss over the next 5 years could be mitigated by \$60 million. In the "No Project" scenario the State and Federal government would not be paying \$480 million dollars to Maxxam. Consequently under the no project alternative, the state and federal governments could completely mitigate the payroll loss while saving \$420 million.
10. The "63,000 No-cut Preserve" alternative has only 41 fewer jobs than the "No Project" alternative.
11. The "63,000 No-cut Preserve" alternative is a distortion of the Trees Foundations Stewardship Plan. The Stewardship Plan calls for ecologically sound management and restoration of a 63,000 acre area through buffer areas, corridors and restoration zones. Even so, in the 63,000 acre area, the Stewardship Plan still allows for annual harvesting of 10 million board feet. 10 million board feet translates into 60 timber jobs. Consequently the Stewardship Plan would generate 19 jobs more than the "No Project" alternative.
12. Not specifically including the Stewardship Plan as an option ignores an ecologically and economically viable alternative. In fact, the HCP and EIS ignore perhaps, the most ecologically and economically beneficial of possible projects.

Prior to 1985 Maxxam Take over:

- Harvest: approximately 120 million board feet per year
- Employment: approximately 900 jobs

Average last 10 Years (1988 - 1997) as Base Year:

- Harvest: 250 million board feet per year
- Employment: 1680 jobs

	Alt. 1 No Project	Alt. 2 Proposed Project	Alt. 2a No Elk River	Alt 3 All Select Cut	Alt 4 63,000 No Cut
Harvest	171	234	221	87	165
Jobs	1147	1565	1384	582	1106
Change	-533	-115	-196	-1098	-574

NO Project i.e. existing laws enforced as base

- Harvest: 171 million board feet per year
- Employment: 1147 jobs

	Alt. 1 No Project	Alt. 2 Proposed Project	Alt. 2a No Elk River	Alt 3 All Select Cut	Alt 4 63,000 No Cut
Harvest	171	234	221	87	165
Jobs	1147	1565	1384	582	1106
Change	0	+418	+237	-565	-41

